

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
UNITED STATES OF AMERICA)	
)	
V.)	Crim. No. 15-cr-10271-WGY
)	
ALEX LEVIN)	
_____)	

DEFENDANT'S ASSENTED-TO
MOTION FOR AMENDMENT OF CONDITIONS OF RELEASE

The defendant, Alex Levin, moves pursuant to 18 U.S.C. § 3145(a)(2) that this Court amend the conditions of release ordered by this Court on May 12, 2016 (Dkt. 85). Specifically, the defendant moves: 1) that he be allowed to travel on specific dates in July and September; 2) that his geographic travel restrictions be broadened to include the greater New England area, specifically to allow him to travel to those states that border Massachusetts: New Hampshire, Connecticut, New York and Rhode Island; and 3) that his curfew be removed, pursuant to his increasing job responsibilities and opportunities. Moving forward, the defendant would notify and seek approval from Probation and Pretrial Services in advance of any travel in addition to the specific travel plans outlined below. The government, through AUSA Anne Paruti, assents to this motion. As grounds therefore, the defendant states the following:

The defendant has abided by his conditions of release at all times since being released in April of 2016. Probation, through the assigned officer, Chrissy Murphy, has indicated that they do not oppose his requests for specific travel to New Hampshire on July 12, 2018 - July 14, 2018 to spend some time away with his fiancé or his request to travel to the New York side of the Berkshires September 14, 2018 - September 16, 2018.

PO Murphy also indicated that Probation has no objection to broadening the defendant's current geographic restriction to the greater New England area, as long as the defendant checks in with her or another officer in advance of planned travel with details about length of stay, lodging, and planned activities. Such willingness to allow the defendant to travel and to broaden his geographic area is a reflection of his cooperation and compliance with his conditions of release, and further indicates that restricting the defendant's movement to Massachusetts is not required to reasonably assure his presence at future Court dates.

Mr. Levin's compliance also merits revisiting of the condition of release imposing a curfew. He has steadfastly adhered to the time restriction requiring him to be home by 1:00 AM on Friday and Saturday nights, but this has come at an opportunity cost in his position at Amazon. The defendant began working at a shipping fulfillment center in August, 2016. He has

been promoted to a full-time position as a Senior Workflow Process Manager. Often, he is offered the opportunity to take on more hours and work later, but he must decline the extra compensation to rush home in order to meet his curfew. Likewise, this limitation is not required to assure his presence and should be removed given his history of compliance, and with the understanding that PO Murphy also does not object to the removal of this condition.

WHEREFORE, the defendant moves that this Court expand his geographic restrictions, and to remove his curfew, with the assent of the Government and Probation and Pretrial services.

ALEX LEVIN
By His Attorneys,

CARNEY & ASSOCIATES

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July 2, 2018

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on or before the above date.

J. W. Carney, Jr.

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AFFIDAVIT SUPPORTING
DEFENDANT'S MOTION FOR AMENDMENT OF CONDITIONS OF RELEASE

I, J. W. Carney, Jr., state that the facts contained in the attached motion are true to the best of my information and belief.

Signed under the penalties of perjury.

J. W. Carney, Jr.
J. W. Carney, Jr.

July 2, 2018